

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: **WILLIAM J. OLMEDA**, aka : **Chapter 13**
William John Olmeda, aka William Olmeda,: **Case No. 5:17-bk-00260**
Debtor,

PNC BANK, NA, :
Movant : **Motion for**
v. : **Relief from Stay**
WILLIAM J. OLMEDA and :
CHARLES J. DEHART, III, TRUSTEE, :
Respondents :

**ANSWER TO MOTION OF
PNC BANK FOR RELIEF FROM STAY**

AND NOW COMES Debtor **WILLIAM J. OLMEDA**, by and through his attorneys,
NEWMAN, WILLIAMS, MISHKIN, CORVELEYN, WOLFE & FARERI, P.C., and in Answer to the
Motion of **PNC BANK** for Relief from Stay avers:

- 1-2. Admitted.
3. Denied. The Trustee is the Standing Trustee, and selected by the Office of United States Trustee.
4. Denied to the extent the documents referenced to not speak for themselves.
5. Admitted.
6. Denied. In addition to the payments acknowledged on the payment history filed with the Motion, Debtor paid \$1,522 on each of January 31, 2018, February 5, 2018 and February 7, 2018. Debtor had difficulty obtaining an amount due via direct contact with Movant. Further, Debtor is research his bank records for additional payments made.
7. Denied. See response to paragraph 6. The amount necessary to bring the loan postpetition current is \$4,291.96 or less.

8. Denied to the extent paragraph 8 is other than a statement or conclusion of law or misplaced request for relief.

9. Denied to the extent paragraph 9 is other than a statement or conclusion of law or misplaced request for relief.

WHEREFORE, Debtor **WILLIAM J. OLMEDA**, respectfully pray this Honorable Court for an Order than the Motion of **PNC BANK** for Relief from Stay be Denied, or, in the alternative, for an adequate protection order that the stay be conditioned future mortgage payments and cure of any postpetition arrears, and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN, WILLIAMS, MISHKIN,
CORVELEYN, WOLFE & FARERI, P.C.

By: /s/ J. Zac Christman

J. Zac Christman, Esquire

Attorney for Debtor

PO Box 511, 712 Monroe Street

Stroudsburg, PA 18360

(570) 421-9090; fax (570) 424-9739

jchristman@newmanwilliams.com